

1 Kelly Dove, Esq.  
2 Nevada Bar No. 10569  
3 Kiah D. Beverly-Graham, Esq.  
4 Nevada Bar No. 11916  
5 SNELL & WILMER L.L.P.  
6 3883 Howard Hughes Pkwy, #1100  
7 Las Vegas, Nevada 89169  
8 Telephone: 702-784-5200  
9 Facsimile: 702-784-5252  
10 Email: kdove@swlaw.com  
11 kbeverly@swlaw.com

12  
13 *Attorneys for Defendant*  
14 *Ford Motor Credit Company LLC*

15  
16 **UNITED STATES DISTRICT COURT**  
17  
**DISTRICT OF NEVADA**

18  
19 RICHARD DANIEL,  
20 Plaintiff,  
21 vs.  
22 WELL'S FARGO HOME MORTGAGE;  
23 FORD MOTOR CREDIT COMPANY LLC;  
24 GREAT LAKES EDUCATIONAL LOAN  
25 SERVICES INC.; ONEMAIN FINANCIAL,  
26 INC.; EQUIFAX INFORMATION SERVICES  
27 LLC and TRANSUNION LLC,  
28 Defendants.

1 Case No.: 2:19-cv-00744-JCM-VCF

2 **STIPULATION AND ORDER TO**  
3 **EXTEND DEADLINE TO RESPOND TO**  
4 **COMPLAINT TO JUNE 7, 2019**  
5 **(FIRST REQUEST)**

6 Pursuant to Local Rule 7-1, Plaintiff Richard Daniel ("Plaintiff") and Defendant Ford  
7 Motor Credit Company LLC ("Ford" and together with Plaintiff the "Parties"), by and through  
8 their respective undersigned counsel of record, submit this Stipulation and Proposed Order.

9 Plaintiff filed a Complaint (the "Complaint") in this Court on May 1, 2019; and  
10 Ford was served with the Complaint on May 7, 2019.

11 This is the Parties' first request for an extension of time to respond to the Complaint and is  
12 not intended to cause any delay or prejudice to any party. The reason for the extension is to give  
13 Ford time to evaluate and respond to the allegations set forth in the Complaint.

1 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time  
2 for Ford to respond to the Complaint in this action is extended to and through June 7, 2019;

3 IT IS FURTHER STIPULATED AND AGREED by and between the Parties that Plaintiff  
4 will not serve discovery upon Ford until June 10, 2019, at the earliest; and

5 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that Ford will  
6 not object to participation in the 26(f) Conference in this action on the basis that it has not yet  
7 answered the Complaint.

8 Dated: May 29, 2019.

9 Dated: May 29, 2019.

10 **KNEPPER & CLARK LLC**

**SNELL & WILMER L.L.P.**

11 By: /s/ Shaina Plaksin  
12 Shaina Plaksin, Esq.  
13 10040 W. Cheyenne Ave.  
14 Suite #170-109  
15 Las Vegas, NV 89129  
*Attorneys for Plaintiff*  
*Richard Daniel*

16 By: /s/ Kiah D. Beverly-Graham  
17 Kelly Dove, Esq.  
18 Kiah D. Beverly-Graham, Esq.  
19 3883 Howard Hughes Pkwy, #1100  
20 Las Vegas, Nevada 89169  
*Attorneys for Defendant Ford Motor Credit*  
*Company LLC*

21 **ORDER**

22 IT IS SO ORDERED: 

23 

---

UNITED STATES DISTRICT JUDGE

24 DATED: May 29, 2019